

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RADIO MUSIC LICENSE COMMITTEE,
INC.,

Plaintiff,

v.

GLOBAL MUSIC RIGHTS, LLC,

Defendant.

Civil Action

No. 2:16-cv-06076-CDJ

Judge C. Darnell Jones, II

**RADIO MUSIC LICENSES COMMITTEE, INC.’S AND GLOBAL MUSIC RIGHTS,
LLC’S JOINT CONSENT MOTION TO ESTABLISH BRIEFING SCHEDULE FOR
MOTION(S) PURSUANT TO RULE 12 IN RESPONSE TO THE FIRST AMENDED
COMPLAINT**

Plaintiff Radio Music License Committee (“RMLC”) and Defendant Global Music Rights, LLC (“GMR”) jointly respectfully request that the Court enter the parties’ agreed briefing schedule to establish deadlines for GMR’s response to RMLC’s First Amended Complaint (Dkt. No. 52) (“FAC”), including any motion(s) pursuant to Rule 12. The grounds for this joint consent motion are as follows:

On February 10, 2017, RMLC filed and served the FAC, and GMR’s response to the FAC is due on February 27, 2017. The parties have conferred and have agreed that, if it is acceptable to the Court, GMR shall file any motion(s) under Rule 12 on March 3, 2017, RMLC shall have until March 24, 2017 to file its opposition(s) to GMR’s motion(s), and GMR shall have until April 7, 2017 to file its motion(s) for leave to submit a reply brief accompanied by its proposed reply or replies. RMLC further agrees not to oppose GMR’s motion(s) for leave to file such a reply or replies. The parties have further agreed that by submitting this joint motion, GMR does not waive its right to assert a lack of personal jurisdiction or improper venue.

The parties' jointly respectfully request that the Court grant this motion and enter the attached proposed order reflecting this briefing schedule.

Dated: February 20, 2017

Respectfully submitted,

/s/ Margaret M. Zwisler

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CERTIFICATION OF COUNSEL

The undersigned certifies that, on February 17 and 19, 2017, counsel for RMLC conferred with counsel for defendant GMR regarding the relief sought by this motion and that all parties agree to the proposed briefing schedule for GMR's motion(s) pursuant to Rule 12 in response to RMLC's First Amended Complaint, RMLC's opposition(s), and GMR's motion(s) for leave to file a reply or replies. This motion is unopposed and consented to by all parties.

/s/ Margaret M. Zwisler
Margaret M. Zwisler (*pro hac vice*)

CERTIFICATE OF SERVICE

The undersigned certifies that, on February 20, 2017, a true and correct copy of the foregoing Radio Music License Committee, Inc.'s and Global Music Rights, LLC's Joint Consent Motion To Establish Briefing Schedule for Motion(s) Pursuant to Rule 12 in Response to the First Amended Complaint was served on all counsel of record by the Court's electronic filing system (CM/ECF).

/s/ Margaret M. Zwisler
Margaret M. Zwisler (*pro hac vice*)